

The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

RYAN KARNOSKI, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:17-cv-01297-MJP

**DECLARATION OF CONNER
CALLAHAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

I, Conner Callahan, declare as follows:

1. My name is Conner Callahan. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. I am a 29-year-old man, and I live in Asheville, North Carolina.

3. I am a Public Safety Officer at Warren Wilson College in Asheville, North Carolina.

4. I have wanted to enlist in the military since age 13. I come from a family with a legacy of military service and consider it my personal calling to serve and protect the people of the United States in this capacity.

5. I would like to put my investigative and problem-solving skills to use for the military. In 2014, with the help of a U.S. Air Force recruiter in Kent, Ohio, I identified the

1 enlisted position I would like to pursue: Explosive Ordnance Disposal (“EOD”).

2 6. I am transgender. I was assigned the sex of female at birth. However, I have
3 known for many years, since approximately early 2012, that I am male.

4 7. I began living openly as male in 2014 and have done so consistently since that
5 time.

6 8. In consultation with health care professionals, I have taken clinically appropriate
7 steps to transition, which were completed in 2015.

8 9. I have taken legal steps to transition. I legally changed my first name to Conner. I
9 have changed my legal gender to male by court order. I also changed my name and gender
10 marker to male on my driver’s license and on my social security card and records.

11 10. On June 30, 2016, I learned about the ban on open transgender service being lifted
12 by the military, and also learned that there would be a path for people like me, who wanted to
13 enlist. I did internet research about the different branches and spoke with an Army recruiter in
14 Cleveland, Ohio in July 2016 because they had expressed that their branch was willing to work
15 with transgender people who wanted to enlist.

16 11. I am ready and able to pursue a military career. When I spoke with military
17 recruiters I was open about my transgender status and discussed with a recruiter what position
18 would be best for me after enlistment. I also took practice Armed Services Vocational Aptitude
19 (also known as “ASVAB”) tests, scoring above the 90th percentile on both tests.

20 12. On July 26, 2017, President Trump posted three tweets that said that transgender
21 people would not be able to serve in the military “in any capacity.”

22 13. I was utterly devastated by this news; it felt as if the floor had fallen out from
23 beneath my feet. I felt betrayed by my country and by our government. I had already sacrificed a
24 great deal in my personal life to come out as transgender, including the loss of support from my
25 then spouse and from family members. This was another crippling blow to my self-worth and
26 identity.

27 14. As a 29-year-old man, I have a finite amount of time to enlist in the military. It
28 has been my life’s goal and it has been difficult to try to make other plans for my future when

1 this is so clearly the best path for me. I want to serve my country and have felt immense regret
2 that I have not yet been able to do so based upon illegitimate considerations.

3 15. However, in reliance upon the preliminary injunction granted by this court, I
4 officially began the process of enlistment to serve in the United States Air Force Reserves on
5 January 5, 2018, by speaking with a national Air Force recruiter by telephone. Should I be
6 successful, enlisting in the Reserves will enable me to retain my primary employment as a Public
7 Safety Officer, in the event the ban is not permanently enjoined.

8 16. The officer I spoke with at the National Air Force Recruitment office connected
9 me with the closest Air Force Reserves Recruitment office, which is located in Duluth, Georgia.
10 I made an appointment to meet at this office on January 24, 2018, to begin processing my
11 enlistment application.

12 17. However, on January 16, 2018, I was informed me that I would need to gather
13 approximately ten legal documents in advance of the appointment. These documents include
14 medical releases regarding my medical care, as well as my original birth certificate, social
15 security card, driver's license, high school diploma, college transcript, and copies of any other
16 legal documents.

17 18. In working to collect these documents, medical staff informed me that it can
18 sometimes take 30 days to receive the paperwork I requested. As a result of this information, my
19 appointment to complete my enlistment application will likely occur in February, allowing me to
20 progress to the next stage of the enlistment process.

21 19. I am cautiously optimistic that this process will be a smooth one, and that I will be
22 able to fulfill my dream of serving in the Air Force Reserves, although I continue to worry about
23 the climate President Trump has created in the military after July 2017 with respect to
24 transgender service members.

25 20. I have shared my excitement as well as my trepidation with my friends and loved
26 ones. I hope that I will be able to serve my country, as so many people before me have done,
27 regardless of their race, sexual orientation, or gender. All that I want is to live openly as the man
28 ///

1 I am and to serve my country with respect and dignity.

2
3 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
4 United States of America that the foregoing is true and correct.

5
6 DATED: January 25, 2018

7 
Conner Callahan

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that all participants in the case are registered CM/ECF users and that service of the foregoing documents will be accomplished by the CM/ECF system on January 25, 2018.



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